

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:25-CV-22530-BECERRA/TORRES

JESUS E. GONZALEZ HERNANDEZ,

Plaintiff,

vs.

STATEWIDE ELECTRICAL SERVICES,  
INC. and NOEL MELO

Defendants.

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**PLAINTIFF'S MOTION FOR DISCOVERY CALENDAR HEARING**

Plaintiff, Jesus E. Gonzalez Hernandez, by and through his undersigned counsel and pursuant to Magistrate Judge Edwin G. Torres' Standing Order Setting Discovery Procedures, hereby requests that the Court convene a discovery calendar hearing before Magistrate Judge Torres regarding ongoing discovery disputes between the parties, and as grounds states as follows:

1. On September 18, 2025, Plaintiff served his First Interrogatories on Defendants, Statewide Electrical Services, Inc. and Noel Melo.
2. On October 16, 2025, Defendants served their respective Answers and Objections to Plaintiff's First Interrogatories. Defendants asserted numerous improper and/or boilerplate objections and failed to provide full and complete responses to these Interrogatories.
3. Between October 23, 2025, and November 13, 2025, the undersigned conferred extensively with Defendants' counsel via email in a good-faith effort to resolve these discovery disputes, including requests that Defendants withdraw their improper objections and provide full, substantive responses. These efforts were unsuccessful.

4. On November 13, 2025, the undersigned also asked about Defendants' availability for a November 20, 2025, Discovery Hearing.

5. This ongoing conferral culminated on November 14, 2025, when Defendants' counsel asserted that Defendants maintain their objections to Plaintiff's First Interrogatories, flatly refused to withdraw Defendants' objections or otherwise supplement their Answers, and expressed that they were not available on November 20, 2025.

6. On November 18, 2025, Defendants' counsel informed the undersigned and the Court that he would be indefinitely unavailable to attend a settlement conference due to an emergency medical absence and would contact the undersigned upon his return to work.

7. On December 12, 2025, the undersigned again contacted Defendants' counsel to request availability for a discovery calendar hearing.

8. In response, on December 15, 2025, Defendants' counsel advised that January 22, 2025, was the earliest date on which he would be available to attend a discovery calendar hearing before Magistrate Judge Torres.

9. The parties have agreed that they are available for a discovery calendar hearing on January 22, 2025, between 10:00 a.m. and 3:00 p.m., to address the disputes raised herein.

10. In compliance with Magistrate Judge Torres' Standing Order, and after conferring with opposing counsel to confirm availability, Plaintiff's counsel contacted Judge Torres' Chambers no later than noon on the Friday preceding the discovery calendar and placed this matter on the next available discovery calendar for January 22, 2025, beginning at 11:30 a.m.

WHEREFORE, Plaintiff respectfully requests that the Court convene a discovery calendar hearing before Magistrate Judge Edwin G. Torres to address Defendants' deficient and improper

Answers and Objections to Plaintiff's First Interrogatories, and for such other relief as the Court deems just and proper.

**CERTIFICATE OF CONFERRAL**

I HEREBY CERTIFY that, prior to this motion's filing, the undersigned has conferred with Defendants' counsel in a good faith attempt to resolve the discovery disputes raised herein but has been unable to do so. The parties have agreed to the date and time of the requested discovery hearing.

Respectfully submitted this 5<sup>th</sup> day of January 2026,

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